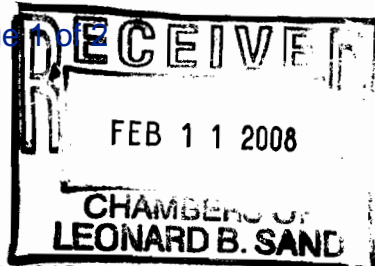
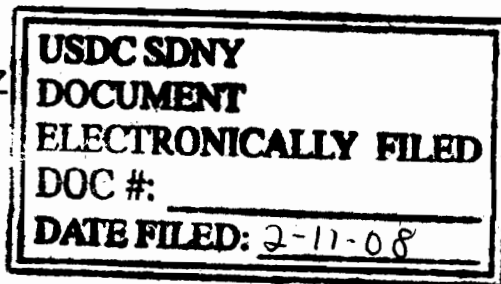


DAVID LOPEZ



ATTORNEY AT LAW

171 EDGE OF WOODS ROAD  
P.O. BOX 323  
SOUTHAMPTON, NEW YORK 11969-0323

TELEPHONE (631) 287-5520  
FACSIMILE (631) 283-4735

January 30, 2008

Hon. Leonard B. Sand  
Judge, United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: Donoghue vs. Local.com Corporation and Hearst Communications, Inc.**  
**07 Civil 8550 (L.S.) // U.S. District Court, S.D.N.Y.**

Your Honor:

Acting on instructions received from your chambers I, as plaintiff's counsel, respectfully advise that counsel to the parties would be available for a Rule 16(b) scheduling conference on the mornings of the following dates: February 21, 25, 26, 27, 2008.

Counsel to the parties submit the following as their agreed schedule for case events and respectfully request its adoption:

1. No additional parties may be added after February 29, 2008.
2. Motions to amend the pleadings shall be made by May 28, 2008.
3. All discovery except for expert discovery shall be completed by September 15, 2008.
4. The parties stipulate that initial disclosures under Rule 26(a)(1) need not be made.
5. Plaintiff and Nominal Defendant Local.com shall designate any experts and furnish expert reports in accordance with Rule 26(a)(2), Fed. R. Civ. P. by November 17, 2008. Hearst Communications shall have until December 18, 2008 to take depositions of any experts designated by the Plaintiff and/or Local.com. Hearst Communications shall designate any experts and furnish experts reports by January 15, 2009. Plaintiff and Local.com shall have until February 18, 2009, to take the depositions of any experts designated by Hearst Communications.

MEMO ENDORSED

MEMO ENDORSED

DAVID LOPEZ

**Hon. Leonard B. Sand**

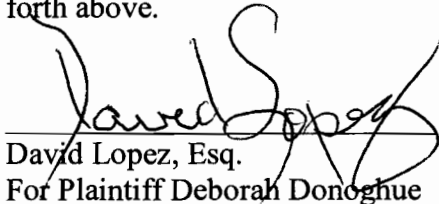
**January 30, 2008**

**Page 2**

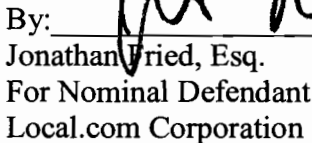
6. Dispositive motions shall be served no later than March 17, 2009.  
Opposition papers shall be served no later than April 17, 2009.  
Reply papers shall be served no later than May 5, 2008.
7. A joint pre-trial order, if necessary, shall be submitted 30 days after the court's resolution of all dispositive motions.
8. Trial, if needed, shall take place on a date to be determined by the court.
9. Pursuant to F.R.C.P. Rule 16(b), this Schedule may be modified upon a showing of good cause with leave of this court or an assigned Magistrate Judge or when authorized by local rule.

Should Your Honor feel the foregoing to be an adequate substitute for a Rule 16(b) Scheduling Conference the parties respectfully request that the conference be dispensed with.

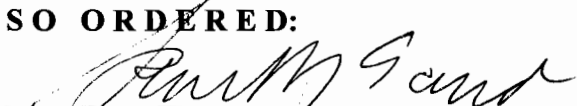
Counsel to all parties have signed below to evidence their agreement to the schedule set forth above.

  
David Lopez, Esq.  
For Plaintiff Deborah Donoghue


Kramer Levin Naftalis & Frankel LLP

By:   
Jonathan Fried, Esq.  
For Nominal Defendant  
Local.com Corporation

**SO ORDERED:**

  
Leonard B. Sand, U.S.D.J.  
New York, New York  
February 11, 2008

Greenberg Traurig, LLP

By:   
Alan Mansfield, Esq.  
For Defendant  
Hearst Communications, Inc.

**MEMO ENDORSED**